

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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CRYSTAL GOINS, 14-G-0840,

Plaintiff,

NOTICE OF DEPOSITION

-vs-

15-CV-6234

CORRECTIONS OFFICER  
WOSNEACK, et al.,

Defendants.

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PLEASE TAKE NOTICE that commencing at 10:00 a.m. on the 21st day of June, 2017, at the Rochester Regional Office, 144 Exchange Blvd., Suite 200, Rochester, NY 14614, the defendants in the above-entitled action will take the deposition of the plaintiff, Crystal Goins, pursuant to the Federal Rules of Civil Procedure. This deposition shall continue from day to day until completed, and will be taken before a notary public or before some other officer authorized by law to administer an oath. You are invited to attend and participate in the manner provided for in the Federal Rules of Civil Procedure.

The plaintiff and/or her attorney is requested to produce at or before the scheduled deposition at the offices of the defendants' counsel, Hillel Deutsch, Assistant Attorney General, all documents bearing upon any allegations, issue of other matters involved in this litigation which are either in the personal possession, custody or control of the plaintiff or are in the possession, custody or control of any agent, representative and/or attorney of the plaintiff and/or are available to the plaintiff or her attorney in connection with this action. For purposes of this request, the term "document" shall

include, but not be limited to, notes, memoranda, correspondence, reports, tapes, articles or other publications, questionnaires and surveys, or any other writings or transcriptions of any kind which may relate, directly or indirectly, to any allegation issue, or other matter involved in this litigation.

Dated: June 7, 2017  
Rochester, New York

ERIC T. SCHNEIDERMAN  
Attorney General of the State of New York  
Attorney for Defendants

s/Hillel Deutsch  
HILLEL DEUTSCH  
Assistant Attorney General of Counsel  
NYS Office of the Attorney General  
144 Exchange Boulevard, Suite 200  
Rochester, New York 14614  
Telephone: (585) 546-7430  
[Hillel.Deutsch@ag.ny.gov](mailto:Hillel.Deutsch@ag.ny.gov)

CERTIFICATE OF SERVICE

I certify that on June 7, 2017, I electronically filed the foregoing Notice of Deposition with the Clerk of the District Court using CM/ECF system, which sent notification of such filing to the following:

1. Michael A. Furlano, Esq.  
Legal Aid Society of Rochester, NY, Inc.  
1 West Main Street, Suite 800  
Rochester, NY 14614
2. Sheldon W. Boyce, Esq.  
Brenna, Brenna & Boyce, PLLC  
31 East Main Street, Suite 2000  
Rochester, NY 14614

And, I hereby certify that I have mailed, by the United States Postal Service, the document to the following non-CM/ECF participant(s):

1. n/a

ERIC T. SCHNEIDERMAN  
Attorney General of the State of New York  
Attorney for Defendants

s/Hillel Deutsch \_\_\_\_\_  
HILLEL DEUTSCH  
Assistant Attorney General of Counsel  
NYS Office of the Attorney General  
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